

JAMES ALLEN,  
  
Plaintiff,  
  
v.  
  
CITY OF CHICAGO,  
Special Representative of the Estate of  
Former Chicago Police Detective  
MICHAEL POCHORDO, deceased,  
Special Representative of the Estate of  
Former Chicago Police Detective  
GEORGE ROTKVICH, JR., deceased,  
Former Chicago Police Sergeant  
JOHN E. TOENINGS, former  
Cook County ASA RICHARD BEUKE,  
former Cook County State's Attorney's  
Office Investigator NORFIE DICIOLLA,  
deceased, and COOK COUNTY,  
  
Defendants.

Comes now, Chester Cameron, Jr., and pursuant to FED. R. CIV. P. 13(3) and LR83.17, respectfully moves this honorable Court to approve withdrawal of representation of Plaintiff, James Allen. In support thereof, undersigned counsel respectfully states as follows:

1. I, Chester Cameron, Jr., have previously filed a Notice of Appearance as a representative of Plaintiff, James Allen in the above-caption case, and I now seek this Court's leave to withdraw from the representation.

2. I certify that I have provided notice of the withdrawal of the representation to Plaintiff, James Allen by Certified and Regular U.S. Mail. (*See* Exhibit 1, Letter of Withdrawal to Plaintiff, James Allen).

3. I also certify that the circumstances support withdrawal, and that my withdrawal from the representation is consistent with the rules of conduct for the jurisdiction(s) in which I am admitted to practice.

4. Plaintiff, James Allen is in the process of deciding whether to proceed *pro se* or to seek new counsel. A Notice of Party Contact Information for James Allen is being filed concurrently with the instant motion. *See* Exhibit 2, Notification of Party Contact Information.

5. Undersigned counsel contacted all counsel of record regarding the instant motion. All parties other than the City of Chicago indicated that they had no objection to the instant motion. At the time of the filing of this motion, and despite two separate e-mail inquiries, Plaintiff's counsel had not received a response from the City of Chicago as to its position on this motion.

WHEREFORE, Attorney Chester Cameron, Jr., respectfully prays that this Court enter an order approving the withdrawal of Chester L. Cameron, Jr. and his firm, Midwest Injury Lawyers, LLC; permitting the Plaintiff sixty (60) days to find substitute counsel; and for all further relief that is just and proper in the premises.

Respectfully submitted,

By: /s/Chester L. Cameron, Jr.

Chester L. Cameron, Jr.

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**CERTIFICATE OF SERVICE**

I, Chester Cameron, Jr., certify that the foregoing Motion to Withdraw from Representation of Plaintiff, James Allen was served on all parties and/or counsel of record via CM/ECF on February 20, 2024.

/s/Chester Cameron, Jr.